

Exhibit A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

In re:)	Chapter 11
)	
MERCY HOSPITAL, IOWA CITY,)	Case No. 23-00623 (TJC)
IOWA, <i>et al.</i>)	
)	(Jointly Administered)
Debtors.)	
)	

**[PROPOSED] AGREED ORDER GRANTING THE JOINT REQUEST OF MERCY
HEALTH NETWORK, INC. AND TRUST OVERSIGHT COMMITTEE REGARDING
SUBMISSION OF AGREED PROPOSED ORDER**

The matter before the Court is the *Joint Status Report and Request of Mercy Health Network, Inc. and Trust Oversight Committee* (the “Request”);¹ and the Court having found it has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue in this district is proper pursuant to 28 U.S.C. § 1409; and the Court having found that the relief requested in the Request is in the best interests of the Debtor, its creditors, and other parties in interest; and the Court having found that the Parties provided adequate and appropriate notice of the Request under the circumstances and that no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Request establish just cause for the relief granted herein:

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED as follows:

1. The Request is granted.
2. The deadline by which the Parties are to submit a proposed order regarding fact witness depositions for the Court’s consideration is hereby extended to June 24, 2025. To the extent the parties fail to submit an agreed proposed order by the June 24, 2025 deadline, the Court shall set a hearing on the Request.

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Request.

3. Notwithstanding any applicability of any Bankruptcy Rule, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Parties are authorized to take all actions, and to execute all documents, necessary or appropriate, to effectuate the relief granted in this Order in accordance with the Request.

5. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Order.

Dated and entered this ____ day of _____, 2025.

Honorable Thad J. Collins, Chief Judge

Order prepared by:

David B. Goroff (*Pro Hac Vice*)

FOLEY & LARDNER LLP

321 N. Clark Street, Suite 3000

Chicago, IL 60654

Tel: (312) 832-4500

Fax: (312) 832-4700

dgoroff@foley.com

-and-

Michael R. Reck

Christopher J. Jessen

BELIN McCORMICK, P.C.

666 Walnut Street, Suite 2000

Des Moines, Iowa 50309

Tel: (515) 243-7100

Fax: (515) 558-0675

mrreck@belinmccormick.com

cjessen@belinmccormick.com

Counsel to Mercy Health Network, Inc., d/b/a MercyOne

So Consented:

/s/ Leslie C. Behaunek

Leslie C. Behaunek, AT0011563

NYEMASTER GOODE, P.C.

700 Walnut, Suite 1300
Des Moines, IA 50309
Telephone: (515) 283-3100
Fax: (515) 283-8045
Email: lcbehaunek@nyemaster.com

-and-

Roy Leaf, AT0014486
NYEMASTER GOODE, P.C.
625 First Street SE, Suite 400
Cedar Rapids, IA 52401-2030
Telephone: (319) 286-7002
Facsimile: (319) 286-7050
Email: rleaf@nyemaster.com

*Counsel for the Mercy Hospital Liquidation
Trust Oversight Committee as Designee of the Liquidation Trustee*